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UBER TECHNOLOGIES, INC., RASIER, LLC,  
And RASIER-CA, LLC

**UNITED STATES DISTRICT COURT**  
**NORTHERN DISTRICT OF CALIFORNIA**  
**SAN FRANCISCO DIVISION**

IN RE: UBER TECHNOLOGIES, INC.,  
PASSENGER SEXUAL ASSAULT  
LITIGATION

This Document Relates to:

*M.A.Y. v. Uber Technologies, Inc., et al.,*  
*3:25-cv-02107-CRB*

Case No. 3:23-md-03084-CRB

**DECLARATION OF CHRISTOPHER V.  
COTTON IN SUPPORT OF DEFENDANTS'  
OPPOSITION TO MOTION TO  
WITHDRAW AS COUNSEL OF RECORD**

Judge: Honorable Charles R. Breyer

**DECLARATION OF CHRISTOPHER V. COTTON**

I, Christopher V. Cotton, declare pursuant to 28 U.S.C. § 1746:

1. I am over the age of 18 and am a resident of Kansas City, Missouri. I respectfully submit this declaration in support of Defendants Uber Technologies, Inc.’s, Rasier, LLC’s, and Rasier-CA, LLC’s (collectively, “Defendants”) opposition to Peiffer Wolf Carr Kane Conway and Wise, LLP’s (“Peiffer Wolf”) motion to withdraw as counsel for Plaintiff M.A.Y.

2. I am a partner at the law firm of Shook, Hardy & Bacon L.L.P., representing Defendants in this MDL as well as in Judicial Council Coordination Proceeding No. 5188, *In Re: Uber Rideshare Cases*, Case No. CJC-21-005188 (the “JCCP”). I am a member in good standing of the Bar of the State of Iowa, the Bar of the State of Missouri, and the Bar of the State of Wisconsin. I make this declaration based upon matters within my own personal knowledge. If called as a witness, I could and would competently testify to the matters set forth herein.

3. Peiffer Wolf represents that it has had difficulty communicating with Plaintiff M.A.Y. since it was retained in October 2022. Yet counsel still filed a complaint raising serious sexual assault allegations against Uber in February 2025 and submitted an (unverified) Plaintiff Fact Sheet and Ride Information Form on her behalf in March 2025.

4. Plaintiff M.A.Y. failed to provide the verification for her Plaintiff Fact sheet that PTO 10 requires. ECF 438 at 5-7. Uber served Plaintiff M.A.Y. with a deficiency notice informing her of this failure on June 2, 2025.

I declare under penalty of perjury under the laws of the State of Missouri that the foregoing is true and correct. Executed on October 24, 2025, in Kansas City, Missouri.

**SHOOK, HARDY & BACON L.L.P.**

/s/ Christopher V. Cotton

CHRISTOPHER V. COTTON

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